

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

X

-against-

17-CR-225 (NSR)

NOTICE OF MOTION

CHUKWUEMEKA OKPARAEKA,

Defendant.

X

TO THE HONORABLE JUDGE OF SAID COURT:

PLEASE TAKE NOTICE that, upon the accompanying Affirmation of Tony Mirvis, Esq., duly sworn to on the 13th day of April, 2018, the exhibits annexed thereto, and the Memorandum of Law submitted herewith, defendant CHUKWUEMEKA OKPARAEKA will move this Court, before the Honorable Nelson S. Roman, at the United States Courthouse for the Southern District of New York, located at 300 Quarropas Street, White Plains, New York, on June 22, 2018, for an Order:

- I. Suppressing all evidence derived from an unlawful seizure and search of Mr. Okparaekе's mail and packages;
- II. Suppressing all evidence derived from an unlawful search of Mr. Okparaekе's cellular telephone;
- III. Suppressing evidence of the browsing history obtained during an unlawful search of Mr. Okparaekе's phone;
- IV. Granting such other relief this Court deems just and proper.

Dated: Brooklyn, New York
April 13, 2018

Respectfully submitted,

THE MIRVIS LAW FIRM, P.C.

By: /s/ Tony Mirvis
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To: Gillian Grossman, Esq. (Via ECF)
Assistant United States Attorney
Southern District of New York

Clerk of Court (NSR) (Via ECF)